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13 International Business Machines Corporation

14 UNITED STATES DISTRICT COURT

15 NORTHERN DISTRICT OF CALIFORNIA

16 (SAN JOSE DIVISION)

17 MARY HELEN WOODSON,

18 Plaintiff,

19 vs.

20 INTERNATIONAL BUSINESS MACHINES
21 CORPORATION and DOES ONE through
22 TWENTY, Inclusive,

23 Defendant.

CASE NO. C 05-03387 JF (PVT)

**STIPULATION AND [PROPOSED]
ORDER EXTENDING DEADLINE TO
FILE RESPONSE TO THIRD AMENDED
COMPLAINT AFTER CONSOLIDATION**

24 WHEREAS, on January 11, 2008, the parties entered into a stipulation extending IBM's
25 deadline to respond to Plaintiff's Third Amended Complaint After Consolidation to February 1,
26 2008 and continuing the Case Management Conference scheduled for February 15, 2008 to March
27 21, 2008;

28 WHEREAS, the purpose for the parties' January 11, 2008 stipulation was that they were in
negotiations regarding settlement of the matter, required additional time for those negotiations,
and wished to postpone a response to Plaintiff's Third Amended Complaint After Consolidation to
avoid any unnecessary increase in litigation costs that might affect the possibility of settlement;

WHEREAS, the parties have not yet settled the matter, but continue to be in negotiations
regarding settlement, require additional time for those negotiations, and continue to wish to

1 postpone a response to Plaintiff's Third Amended Complaint After Consolidation and the related
2 litigation expenses associated with such a response;

3 WHEREAS, the parties agree to extend the deadline for IBM to respond to Plaintiff's
4 Third Amended Complaint After Consolidation until February 29, 2008;

5 WHEREAS, the parties agree that any hearing on IBM's response to Plaintiff's Third
6 Amended Complaint After Consolidation, if necessary, shall be scheduled no earlier than April 4,
7 2008; and

8 WHEREAS, the parties are not requesting that the Case Management Conference,
9 currently scheduled for March 21, 2008, at 10:30 a.m., be rescheduled (but do not object to its
10 being moved if the Court should so desire).

11 NOW, THEREFORE, IT IS HEREBY STIPULATED, by and between the parties, that
12 IBM's response to Plaintiff's Third Amended Complaint After Consolidation shall be due on
13 February 29, 2008 and any hearing on IBM's response to Plaintiff's Third Amended Complaint
14 After Consolidation, if necessary, shall be scheduled no earlier than April 4, 2008.

15
16 Dated: January 31, 2008

MARY HELEN WOODSON

17
18 By /s/ Mary Helen Woodson
Mary Helen Woodson

19
20 Dated: January 31, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP


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23 By /s/ Scott G. Lawson
Scott G. Lawson
24 Attorneys for Defendant
International Business Machines Corporation
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Order

Pursuant to the foregoing stipulation between the parties, IT IS SO ORDERED.

Dated: 2/12/08



Jeremy Fogel
United States District Judge

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Signature Attestation

I hereby attest that Plaintiff Mary Helen Woodson read and agreed to the above
**STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE
RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** and gave
Quinn Emanuel permission to sign and file the stipulation on her behalf.

Dated: January 31, 2008

QUINN EMANUEL URQUHART OLIVER &
HEDGES, LLP

By /s/ Scott G. Lawson
Scott G. Lawson
Attorneys for Defendant
International Business Machines Corporation

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2 **CERTIFICATE OF SERVICE**

3 I am employed in the County of San Mateo, State of California. I am over the age of
4 eighteen years and not a party to the within action; my business address is 555 Twin Dolphin
Drive, Suite 560, Redwood Shores, California 94065-2139.

5 On **January 31, 2008**, I served true copies of the following document(s) described as
6 **STIPULATION AND [PROPOSED] ORDER EXTENDING DEADLINE TO FILE**
7 **RESPONSE TO THIRD AMENDED COMPLAINT AFTER CONSOLIDATION** on the
parties in this action as follows:

8 **BY MAIL:** On **January 31, 2008**, I enclosed the foregoing into sealed envelope(s) addressed as
shown above, and I deposited such envelope(s) in the mail at Redwood Shores, California. The
envelope was mailed with postage thereon fully prepaid.

9 **BY ELECTRONIC MAIL TRANSMISSION:** By electronic mail transmission from
10 andreaproberts@quinnemanuel.com on **January 31, 2008**, by transmitting a PDF format copy of
such document(s) to each such person at the e-mail address listed below their address(es). The
11 document(s) was/were transmitted by electronic transmission and such transmission was reported
as complete and without error.

12 Mary Helen Woodson
13 475 Milan Drive, #102
San Jose, CA 95134
14 Telephone: 408-944-9152
Cell Phone: 408-206-4087
15 helenwoodson@gmail.com

16 I declare that I am employed in the office of a member of the bar of this Court at whose
17 direction the service was made.

18 Executed on **January 31, 2008**, at Redwood Shores, California.

19
20 /s/ Andrea Pallios Roberts
Andrea Pallios Roberts
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